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22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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WELLS FARGO BANK, NATIONAL
ASSOCIATION AS TRUSTEE FOR
OPTION ONE MORTGAGE LOAN TRUST
2007-6, ASSET-BACKED CERTIFICATES,
SERIES 2007-6,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-cv-00112-RFB-DJA

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
FIDELITY NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO MOTION FOR
REMAND AND MOTION FOR FEES
AND COSTS**

(First Request)

1 Defendant Fidelity National Title Insurance Company (“Fidelity”) and Plaintiff Wells
2 Fargo Bank, National Association as Trustee for Option One Mortgage Loan Trust 2007-6, Asset-
3 Backed Certificates, Series 2007-6 (“Wells Fargo”) (collectively, the “Parties”), by and through
4 their counsel of record, hereby stipulate and agree as follows:

- 5 1. On January 19, 2021, Wells Fargo filed its Complaint in the Eighth Judicial District
6 Court, Case No. A-21-828044-C [ECF No. 1-1];
- 7 2. On January 20, 2021, Fidelity filed a Petition for Removal to this Court [ECF No. 1];
- 8 3. On February 22, 2021, Wells Fargo filed a Motion for Remand [ECF No. 9];
- 9 4. On February 22, 2021, Wells Fargo filed a Motion for Costs and Fees [ECF Nos. 10];
- 10 5. Fidelity’s deadline to respond to Wells Fargo’s Motion for Remand and Motion for
11 Costs and Fees is currently March 9, 2021;
- 12 6. Fidelity’s counsel is requesting an extension until Monday, March 31, 2021, to file its
13 response to the pending Motion for Remand and Motion for Costs and Fees;
- 14 7. Fidelity requests a brief extension of time to respond to the Motion for Remand and
15 Motion for Costs and Fees to afford Fidelity additional time to respond to the legal
16 arguments set forth in Wells Fargo’s motions;
- 17 8. Wells Fargo does not oppose the requested extension;
- 18 9. This is the first request for an extension which is made in good faith and not for
19 purposes of delay;

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1 **IT IS SO STIPULATED** that Fidelity's deadline to respond to Wells Fargo's Motion for
2 Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10] is hereby extended through
3 and including March 31, 2021.

4
5 Dated: March 5, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

6
7 By: /s/-- Sophia S. Lau
SCOTT E. GIZER
SOPHIA S. LAU
Attorneys for Defendant FIDELITY
8 NATIONAL TITLE INSURANCE
9 COMPANY

10
11 Dated: March 5, 2021

SINCLAIR BRAUN LLP

12 By: /s/-Kevin S. Sinclair
KEVIN S. SINCLAIR
Attorneys for Defendant FIDELITY
13 NATIONAL TITLE INSURANCE
14 COMPANY

15 Dated: March 5, 2021

WRIGHT FINLAY & ZAK, LLP

16 By: /s/-Lindsay D. Robbins
LINDSAY D. ROBBINS
Attorneys for Plaintiff WELLS FARGO
17 BANK, N.A.
18

19 **IT IS SO ORDERED:**

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21 Dated: March 12, 2021.

22 
RICHARD E. BOULWARE, II
23 **United States District Court**
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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

